

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

DEVIN G. NUNES

Plaintiff,

v.

FUSION GPS A/KA BEAN LLC, GLENN
SIMPSON, and CAMPAIGN FOR
ACCOUNTABILITY, INC.

Defendants.

Civil Case No. 1:19-cv-1148

**DECLARATION OF GLENN SIMPSON IN SUPPORT OF THE MOTION TO DISMISS
OF DEFENDANTS FUSION GPS AND GLENN SIMPSON**

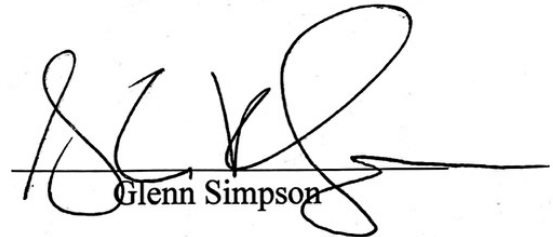
I, Glenn Simpson, declare as follows:

1. My name is Glenn Simpson, and I am of legal age and competent to give this Declaration.
2. I am domiciled in Washington, D.C.
3. I am a founder and principal of Bean LLC d/b/a Fusion GPS and am familiar with its operations.
4. I work in Washington, D.C. for Bean LLC d/b/a Fusion GPS.
5. Bean LLC d/b/a Fusion GPS is incorporated in Delaware and its principal place of business is Washington, D.C. Bean LLC d/b/a Fusion GPS does not have any offices in Virginia.
6. I did not do any work in Virginia on *Crime in Progress*, the “dossier,” or any of the ethics complaints described in Plaintiff Nunes’ amended complaint.
7. Bean LLC d/b/a Fusion GPS did not do any work in Virginia on *Crime in Progress*, the “dossier,” or any of the ethics complaints described in Plaintiff Nunes’ amended complaint.

8. Most, if not all, of Bean LLC d/b/a Fusion GPS' clients, agents, and donors are located outside of Virginia.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 14, 2020



Glenn Simpson